

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**TOUCHPOINT PROJECTION  
INNOVATIONS, LLC,**

**Plaintiff,**

**v.**

**BROADCOM INC.**

**Defendant**

**Civil Action: 2:24-cv-00980-JRG  
LEAD CASE**

**UNOPPOSED MOTION FOR A 28-DAY STAY OF ALL PENDING DEADLINES  
AND NOTICE OF SETTLEMENT**

Plaintiff Touchpoint Projection Innovations, LLC respectfully notifies the Court that Plaintiff and Defendant Broadcom Inc. have reached a settlement in principle. The Parties, however, require additional time to finalize the agreement and corresponding settlement documents.

The Parties, therefore, respectfully request that the Court stay all pending motions, actions and deadlines for twenty-eight (28) days, up to and including April 2, 2025, while the Parties work to finalize their resolution of this lawsuit, including the submission of a Motion to Dismiss. The requested stay is not for delay, but to allow for continued efforts toward an orderly resolution of this lawsuit. Plaintiff has conferred with counsel for Defendant Broadcom, Inc. and Defendant does not oppose the present motion.

Dated: March 5, 2025

Respectfully submitted,

/s/ Randall Garteiser

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**COUNSEL FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY on this, I caused to be electronically-filed the foregoing document with the Clerk of Court using the Court's CM/ECF system. As such, this document was served on all counsel who are deemed to have consented to electronic service.

*/s/ Randall Garteiser*  
Randall Garteiser

**CERTIFICATE OF GOOD FAITH CONFERENCE**

Pursuant to Eastern District of Texas Local Rule CV-7(i), counsel has complied with the meet and confer requirement in Local Rule CV-7(h). The Parties are in agreement with this unopposed stay.

*/s/ Randall Garteiser*  
Randall Garteiser